

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAPHNE MOORE,
Defendant

Crim. No. 3:18-CR-30001-WGY

JOINT MOTION TO CONTINUE TRIAL

Now come the Defendant, Daphne Moore, and the United States and jointly move to continue the trial, presently scheduled for December 4, 2023, until a date no earlier than February 26, 2024.

As grounds therefore, the parties assert the following:

1. The parties are actively engaged in discussions about a potential resolution of this case. Those discussions will not be concluded until at least mid-November of 2023.
2. This case involves voluminous discovery. Current trial counsel for both sides were not the original attorneys and require additional time to review and digest the voluminous discovery in order to adequately prepare for a trial, should a trial be necessary.
3. Thus, both parties agree that a continuance is necessary to allow for the ongoing negotiations and to adequately prepare for trial should the parties not reach a resolution.
4. Trial counsel for the Government is scheduled to begin a trial on January 29, 2024 that is estimated to last one week. Trial counsel for Ms. Moore is scheduled to teach

at a trial skills program in Denver, Colorado from February 5 through February 9, 2024. Thus, the parties request a trial date no earlier than February 26, 2024.

5. The parties will notify the Court as soon as possible if they are able to reach a resolution.

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 11, 2023.

/s/Paul Rudof

Respectfully Submitted,

DAPHNE MOORE

By her attorney,

/s/Paul Rudof

Paul Rudof

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